

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA

v.

MATTHEW TUNSTALL

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CAUSE NO. 1:21-CR-00223-LY

ADVISORY TO THE COURT: OUTSTANDING PSR OBJECTIONS

TO THE HONORABLE LEE YEAKEL, UNITED STATES DISTRICT JUDGE FOR
THE WESTERN DISTRICT OF TEXAS:

In an attempt to streamline issues, counsel advises the Court of the outstanding legal objections related to the PSR:

<u>Category</u>	<u>PSR</u>	<u>Gov</u>	<u>Def</u>	<u>Legal Issue</u>
1. Base Offense Level	+ 6	+7	+6	The parties disagree about the application of USSG §§ 2S1.1 and 2B1.1(a)(2).
2. Loss Amount	+ 18	+18	+16	The parties disagree about loss.
3. Vulnerable Victims	+0	+2	+0	The parties disagree about the application of USSG § 3A1.1, Application Note 2.
4. Role in Offense	+ 2	+4	+2	The parties disagree about the application of U.S.S.G. §§ 3B1.1(b)(c).
5. Victims	+ 2	+2	+2	The parties agree.
6. Sophisticated Means	+ 2	+2	+2	The parties agree.
7. Laundering	+ 2	+2	+2	The parties agree.
8. Political Org.	+ 2	+2	+2	The parties agree.
9. Acceptance	- 3	-3	-3	The parties agree.

<u>Total</u>	PSR:	Govt:	Def.
	31	36	29

Respectfully submitted,

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By: /s/ Worth D. Carroll

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ATTORNEY FOR DEFENDANT
MATTHEW NELSON TUNSTALL

CERTIFICATE OF SERVICE

By my signature below, I do hereby certify that on the 18th day of April, 2023, a true and correct copy of the foregoing Advisory to the Court was served on the government via electronic mail.

/s/ Worth D. Carroll
Worth D. Carroll